

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

IN RE MAT FIVE SECURITIES  
LITIGATION

Civil Action No. 08 CIV 4152 NRB

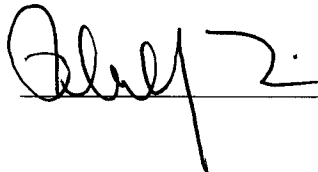
CLASS ACTION

NOTICE OF MOTION TO ADMIT  
KIRK B. HULETT, BLAKE MUIR  
HARPER AND SARAH P. WEBER *PRO*  
*HAC VICE*

PLEASE TAKE NOTICE that upon the annexed affidavit of Phillip Kim, the Declarations of Kirk B. Hulett, Blake Muir Harper, and Sarah P. Weber, and Certificate of Good Standing submitted in support of this motion, the undersigned will move this Court before the Honorable Judge Naomi R. Buchwald at the United States Courthouse for the Southern District of New York, pursuant to Local Rule 1.3 (c) of the Local Rules of the United States District Courts for the Southern and Eastern Districts of New York for an Order allowing the admission Kirk B. Hulett and Blake Muir Harper, partners and Sarah P. Weber an associate at Hulett Harper Stewart LLP and members in good standing of the Bar of the State of California, as attorneys *pro hac vice* to argue or try this case in whole or in part as counsel. There are no pending disciplinary proceedings against Kirk B. Hulett, Blake Muir Harper, or Sarah P. Weber in any State or Federal Court.

DATED: 7/24/08  
New York, NY

THE ROSEN LAW FIRM, P.A.  
LAURENCE M. ROSEN (LR 5733)  
PHILLIP KIM (PK 9384)



350 Fifth Avenue, Suite 5508  
New York, NY 10118  
Telephone: (212) 686-1060  
Facsimile: (212) 202-3827

Liaison Counsel for Movant Michael J. Stone,  
Trustee, FBO Michael Joel Stone Revocable Trust  
Dated October 1999

HULETT HARPER STEWART LLP  
KIRK B. HULETT (KBH 2281)  
BLAKE MUIR HARPER (BMH 0479)  
SARAH P. WEBER (SPW 9296)  
550 West C Street, Suite 1600  
San Diego, CA 92101  
Telephone: (619) 338-1133  
Facsimile: (619) 338-1139

Lead Counsel for Movant Michael J. Stone, Trustee,  
FBO Michael Joel Stone Revocable Trust Dated  
October 1999

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

IN RE MAT FIVE SECURITIES  
LITIGATION

**Civil Action No. 08 CIV 4152 NRB**

**CLASS ACTION**

**AFFIDAVIT OF PHILLIP KIM IN  
SUPPORT OF MOTION TO ADMIT  
BLAKE MUIR HARPER, KIRK B.  
HULETT, AND SARAH P. WEBER *PRO*  
*HAC VICE***

State of New York )

) ss:

County of New York )

PHILLIP KIM, being duly sworn, hereby deposes and says as follows:

1. I am an attorney duly licensed to practice before Courts of the State of New York and the United States District Court of the Southern District of New York. I am a member in good standing of each the aforementioned Courts.

2. I am an attorney with the Rosen Law Firm, P.A., counsel for Plaintiffs in this action. I move this Court for the admission of Kirk B. Hulett, Blake Muir Harper, and Sarah P. Weber of Hulett Harper Stewart LLP *pro hac vice*, and in support thereof state:

3. Kirk B. Hulett is a member of Hulett Harper Stewart LLP, 550 West C Street, Suite 1600, San Diego, California 92101, Telephone: (619) 338-1133, Facsimile: (619)338-1139.

4. Blake Muir Harper is a member of Hulett Harper Stewart LLP, 550 West C Street, Suite 1600, San Diego, California 92101, Telephone: (619) 338-1133, Facsimile: (619)338-1139.

5. Sarah P. Weber is an associate at Hulett Harper Stewart LLP, 550 West C Street,

Suite 1600, San Diego, California 92101, Telephone: (619) 338-1133, Facsimile: (619)338-1139

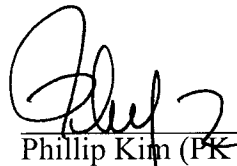
6. They are members of the California Bar in good standing (see certificates of good standing).

7. They are not currently suspended or disbarred in any court.


8. They do not reside in the Southern District of New York, is not regularly employed in this District, and does not regularly engage in the practice of law in this District.

9. They have obtained and are familiar with the Local Rules of this Court.

10. Attached to this Affidavit are the Declarations of Kirk B. Hulett, Blake Muir Harper, and Sarah P. Weber and a proposed Order for each submitted for the Court's approval.

  
Phillip Kim (PK 9384)

Sworn to before me  
July 24, 2008

  
**T.W. BROWN**  
**Notary Public, State of New York**  
**No. 02BR6140981**  
**Qualified in Queens County**  
**Commission Expires 02/13/10**

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

IN RE MAT FIVE SECURITIES  
LITIGATION

**Civil Action No. 08 CIV 4152 NRB**

**CLASS ACTION**

**DECLARATON OF BLAKE MUIR  
HARPER IN SUPPORT OF MOTION  
FOR ADMISSION PRO HAC VICE**

I, BLAKE MUIR HARPER, declare as follows:

1. I am a partner with the Hulett Harper Stewart LLP. I submit this Declaration in support of the motion for my admission to practice *pro hac vice* in the above captioned matter.
2. As shown in the Certificate of Good Standing annexed hereto I am a member in good standing of the Bar of the State of California.
3. There are no pending disciplinary proceedings against me in any State or Federal court.
4. I am familiar with the Local Rules of this Court.
5. I do not live in the Southern District of New York, am not regularly employed in this District, and do not regularly engage in the practice of law in this District.

I declare under penalty of perjury that the foregoing is true and correct.

Respectfully submitted this 23 day of July 2008.

  
BLAKE MUIR HARPER

# EXHIBIT A



# THE STATE BAR OF CALIFORNIA

MEMBER SERVICES CENTER

180 HOWARD STREET, SAN FRANCISCO, CALIFORNIA 94105-1639

TELEPHONE: 888-800-3400

July 17, 2008

TO WHOM IT MAY CONCERN:

This is to certify that according to the records of the State Bar, BLAKE M. HARPER, #115756 was admitted to the practice of law in this state by the Supreme Court of California on December 3, 1984; and has been since that date, and is at date hereof, an ACTIVE member of the State Bar of California; and that no recommendation for discipline for professional or other misconduct has ever been made by the Board of Governors or a Disciplinary Board to the Supreme Court of the State of California.

THE STATE BAR OF CALIFORNIA

A handwritten signature in black ink, appearing to read "Kath Lambert", is written over a horizontal line.

Kath Lambert  
Custodian of Membership Records

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

IN RE MAT FIVE SECURITIES  
LITIGATION

**Civil Action No. 08 CIV 4152 NRB**

**CLASS ACTION**

**ORDER FOR ADMISSION *PRO HAC*  
*VICE* OF BLAKE MUIR HARPER ON  
WRITTEN MOTION**

Upon the Motion of Phillip Kim attorney for Michael Joel Stone Revocable Trust and Albeco, Inc. and said sponsor attorney's affidavit in support;

**IT IS HEREBY ORDERED** that:

BLAKE MUIR HARPER  
HULETT HARPER STEWART LLP  
550 West C Street, Suite 1600  
San Diego, CA 92101  
Telephone: (619) 338-1133  
Facsimile: (619) 338-1139  
bmh@huletttharper.com

is admitted to practice *pro hac vice* as counsel for Michael Joel Stone Revocable Trust and Albeco, Inc. in the above captioned case in the United States District Court for the Southern District of New York. All attorneys appearing before this Court are subject to the Local Rules of this Court, including the Rules governing discipline of attorneys. If this action is assigned to Electronic Case Filing (ECF) system, counsel shall immediately apply for an ECF password at nysd.uscourts.gov. Counsel shall forward the *pro hac vice* fee to the Clerk of the Court.

DATED: \_\_\_\_\_  
New York, New York

\_\_\_\_\_  
HONORABLE JUDGE NAOMI R. BUCHWALD,  
UNITED STATES DISTRICT COURT JUDGE



**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

IN RE MAT FIVE SECURITIES  
LITIGATION

**Civil Action No. 08 CIV 4152 NRB**

**CLASS ACTION**

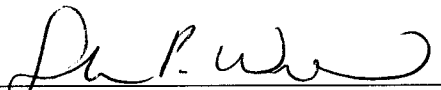
**DECLARATON OF SARAH P. WEBER IN  
SUPPORT OF MOTION FOR  
ADMISSION PRO HAC VICE**

I, SARAH P. WEBER, declare as follows:

1. I am an associate with the Hulett Harper Stewart LLP. I submit this Declaration in support of the motion for my admission to practice *pro hac vice* in the above captioned matter.
2. As shown in the Certificate of Good Standing annexed hereto I am a member in good standing of the Bar of the State of California.
3. There are no pending disciplinary proceedings against me in any State or Federal court.
4. I am familiar with the Local Rules of this Court.
5. I do not live in the Southern District of New York, am not regularly employed in this District, and do not regularly engage in the practice of law in this District.

I declare under penalty of perjury that the foregoing is true and correct.

Respectfully submitted this 23 day of July 2008.

  
\_\_\_\_\_  
SARAH P. WEBER

# EXHIBIT A



# THE STATE BAR OF CALIFORNIA

MEMBER SERVICES CENTER

180 HOWARD STREET, SAN FRANCISCO, CALIFORNIA 94105-1639

TELEPHONE: 888-800-3400

July 17, 2008

## TO WHOM IT MAY CONCERN:

This is to certify that according to the records of the State Bar, SARAH PICKERAL WEBER, #239979 was admitted to the practice of law in this state by the Supreme Court of California on December 1, 2005; and has been since that date, and is at date hereof, an ACTIVE member of the State Bar of California; and that no recommendation for discipline for professional or other misconduct has ever been made by the Board of Governors or a Disciplinary Board to the Supreme Court of the State of California.

THE STATE BAR OF CALIFORNIA

A handwritten signature in black ink, appearing to read "Kath Lambert", is written over the printed name.

Kath Lambert  
Custodian of Membership Records

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

IN RE MAT FIVE SECURITIES  
LITIGATION

**Civil Action No. 08 CIV 4152 NRB**

**CLASS ACTION**

**ORDER FOR ADMISSION *PRO HAC*  
*VICE* OF SARAH P. WEBER ON  
WRITTEN MOTION**

Upon the Motion of Phillip Kim attorney for Michael Joel Stone Revocable Trust and Albeco, Inc. and said sponsor attorney's affidavit in support;

**IT IS HEREBY ORDERED** that:

SARAH P. WEBER  
HULETT HARPER STEWART LLP  
550 West C Street, Suite 1600  
San Diego, CA 92101  
Telephone: (619) 338-1133  
Facsimile: (619) 338-1139  
sweber@huletttharper.com

is admitted to practice *pro hac vice* as counsel for Michael Joel Stone Revocable Trust and Albeco, Inc. in the above captioned case in the United States District Court for the Southern District of New York. All attorneys appearing before this Court are subject to the Local Rules of this Court, including the Rules governing discipline of attorneys. If this action is assigned to Electronic Case Filing (ECF) system, counsel shall immediately apply for an ECF password at [nysd.uscourts.gov](http://nysd.uscourts.gov). Counsel shall forward the *pro hac vice* fee to the Clerk of the Court.

DATED: \_\_\_\_\_  
New York, New York

\_\_\_\_\_  
HONORABLE JUDGE NAOMI R. BUCHWALD,  
UNITED STATES DISTRICT COURT JUDGE

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

IN RE MAT FIVE SECURITIES  
LITIGATION

**Civil Action No. 08 CIV 4152 NRB**

**CLASS ACTION**

**DECLARATON OF KIRK B. HULETT IN  
SUPPORT OF MOTION FOR  
ADMISSION PRO HAC VICE**

I, KIRK B. HULETT, declare as follows:

1. I am a partner with the Hulett Harper Stewart LLP. I submit this Declaration in support of the motion for my admission to practice *pro hac vice* in the above captioned matter.
2. As shown in the Certificate of Good Standing annexed hereto I am a member in good standing of the Bar of the State of California.
3. There are no pending disciplinary proceedings against me in any State or Federal court.
4. I am familiar with the Local Rules of this Court.
5. I do not live in the Southern District of New York, am not regularly employed in this District, and do not regularly engage in the practice of law in this District.

I declare under penalty of perjury that the foregoing is true and correct.

Respectfully submitted this 23 day of July 2008.

  
KIRK B. HULETT

EXHIBIT A



# THE STATE BAR OF CALIFORNIA

MEMBER SERVICES CENTER

180 HOWARD STREET, SAN FRANCISCO, CALIFORNIA 94105-1639

TELEPHONE: 888-800-3400

July 17, 2008

## TO WHOM IT MAY CONCERN:

This is to certify that according to the records of the State Bar, KIRK BARTLETT HULETT, #110726 was admitted to the practice of law in this state by the Supreme Court of California on December 12, 1983; and has been since that date, and is at date hereof, an ACTIVE member of the State Bar of California; and that no recommendation for discipline for professional or other misconduct has ever been made by the Board of Governors or a Disciplinary Board to the Supreme Court of the State of California.

THE STATE BAR OF CALIFORNIA

A handwritten signature in black ink, appearing to read "Kath Lambert", is written over the printed name.

Kath Lambert  
Custodian of Membership Records

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

IN RE MAT FIVE SECURITIES  
LITIGATION

**Civil Action No. 08 CIV 4152 NRB**

**CLASS ACTION**

**ORDER FOR ADMISSION *PRO HAC*  
*VICE* OF KIRK B. HULETT ON  
WRITTEN MOTION**

Upon the Motion of Phillip Kim attorney for Michael Joel Stone Revocable Trust and Albeco, Inc. and said sponsor attorney's affidavit in support;

**IT IS HEREBY ORDERED** that:

KIRK B. HULETT  
HULETT HARPER STEWART LLP  
550 West C Street, Suite 1600  
San Diego, CA 92101  
Telephone: (619) 338-1133  
Facsimile: (619) 338-1139  
kbh@huletharper.com

is admitted to practice *pro hac vice* as counsel for Michael Joel Stone Revocable Trust and Albeco, Inc. in the above captioned case in the United States District Court for the Southern District of New York. All attorneys appearing before this Court are subject to the Local Rules of this Court, including the Rules governing discipline of attorneys. If this action is assigned to Electronic Case Filing (ECF) system, counsel shall immediately apply for an ECF password at nysd.uscourts.gov. Counsel shall forward the *pro hac vice* fee to the Clerk of the Court.

DATED: \_\_\_\_\_  
New York, New York

\_\_\_\_\_  
HONORABLE JUDGE NAOMI R. BUCHWALD,  
UNITED STATES DISTRICT COURT JUDGE



UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X :  
: Case No.: 08-civ-4152 (NRB)  
: **CERTIFICATE OF SERVICE**  
In re: MAT FIVE SECURITIES LITIGATION :  
:   
-----X :

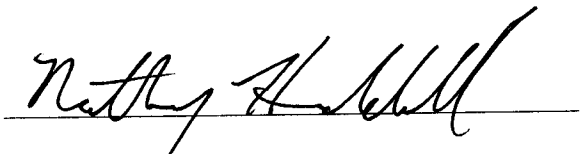
The undersigned certifies and declares as follows:

I am over the age of 18 and not a party to this action. My business address is 350 Fifth Avenue, Suite 5508, New York, New York, 10118, which is in the county where the mailing described below took place.

On July 24, 2008, I served the within: (1) NOTICE OF MOTION TO ADMIT KIRK B. HUELETT, BLAKE MUIR HARPER AND SARAH P. WEBER *PRO HAC VICE*; (2) AFFIDAVIT OF PHILLIP KIM IN SUPPORT OF MOTION TO ADMIT BLAKE MUIR HARPER, KIRK B. HUELETT, AND SARAH P. WEBER *PRO HAC VICE*; (3) DECLARATION OF BLAKE MUIR HARPER IN SUPPORT OF MOTION FOR ADMISSION *PRO HAC VICE*; (4) ORDER FOR ADMISSION *PRO HAC VICE* OF BLAKE MUIR HARPER ON WRITTEN MOTION; (5) DECLARATION OF SARAH P. WEBER IN SUPPORT OF MOTION FOR ADMISSION *PRO HAC VICE*; (6) ORDER FOR ADMISSION *PRO HAC VICE* OF SARAH P. WEBER ON WRITTEN MOTION; (7) DECLARATION OF KIRK B. HUELETT IN SUPPORT OF MOTION FOR ADMISSION *PRO HAC VICE*; and (8) ORDER FOR ADMISSION *PRO HAC VICE* OF KIRK B. HUELETT ON WRITTEN MOTION, by U.S. mail on the parties identified in the attached service list. I placed a true and correct copy thereof in a sealed envelope addressed as set forth on the attached service list and caused such envelope, with first class postage thereupon fully prepaid, to be placed in the U.S. Mail at New York, New York, and certify that such envelope was placed for collection and mailing following ordinary business practices.

I declare that I am employed in the office of a member of the bar of this court at whose direction service was made.

Executed: July 24, 2008, in New York, New York.

  
Nathan Huddell

**SERVICE LIST**

Charles E. Davidow, Esq.  
PAUL, WEISS, RIFKIN, WHARTON &  
GARRISON LLP  
1615 L Street, NW  
Washington, DC 20036-5694

Sean R. O'Brien  
ARKIN KAPLAN RICE LLP  
580 Madison Avenue, 35<sup>th</sup> Floor  
New York, New York 10022

*Attorneys for defendants MAT Five LLC,  
Citigroup Alternative Investments LLC,  
Citigroup Fixed Income Alternatives, and  
Citigroup Global Markets, Inc.*

*Attorneys for defendant Reaz Islam*

Kirk B. Hulett, Esq.  
Blake M. Harper, Esq.  
Sarah P. Weber, Esq.  
HULETT HARPER STEWART LLP  
550 West C Street, Suite 1600  
San Diego, CA 92101

*Lead Counsel for Plaintiffs*